

3/13/2019

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122  
Ex Parte Letter

Dear Ms. Dortch:

Learfield IMG College writes to express its ardent support for the Market-Based Approach as proposed by the C-Band Alliance (“CBA”) to repurpose 200 MHz of C-band spectrum (inclusive of a 20 MHz guard band) for flexible use. [Learfield IMG College previously articulated concerns regarding any repurposing of C-band spectrum for expanded terrestrial use, but today writes to express its support for the Market-Based Approach.<sup>1</sup>] Of the various proposals in the record, the Market-Based Approach is the clear choice.

The Market-Based Approach is the only plan that will fully protect existing C-band customers while quickly making substantial C-band spectrum available for terrestrial 5G. Repurposing 200 MHz of spectrum is a sound approach because it will ensure that current customers can continue utilizing the C-band to provide content distribution and other vital services to American consumers. Moreover, CBA members have committed publicly to launching new satellites to ensure that they have the same capacity to carry video and other services in 300 MHz of spectrum that they have today in 500 MHz.<sup>2</sup> As a result, under the Market-Based Approach Learfield IMG College and other current C-band users will continue to be served in the C-band, which is uniquely situated for nationwide content distribution. No other plan, including those proposed by T-Mobile USA, Inc. (“T-Mobile”) and Charter Communications, Inc. (“Charter”), explains how the programmers and broadcasters that rely on C-band spectrum today to reach over 100 million households will be protected in the future.

T-Mobile’s most recent proposal is a scorched-earth plan that could expel programmers and broadcasters from the C-band entirely.<sup>3</sup> T-Mobile’s plan proposes to clear a maximum of 500 MHz and a minimum of 300 MHz in some or all PEAs. Clearing that amount of spectrum would certainly result in loss of C-band service for at least some existing satellite customers.<sup>4</sup> T-Mobile suggests that fiber is the savior for dispossessed C-band customers. But the record in this

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<sup>1</sup> [Comments of Learfield IMG College GN Docket No. 18-122 (Oct. 29, 2019).] or [Reply Comments of Learfield IMG College GN Docket No. 18-122 (Dec. 11, 2018).]

<sup>2</sup> See, e.g., Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance (Feb. 7, 2019) (“CBA *Ex Parte* Letter”).

<sup>3</sup> Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile USA, Inc. (Feb. 15, 2019).

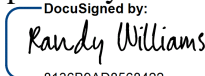
<sup>4</sup> See, e.g., CBA *Ex Parte* Letter.

proceeding is unequivocal—fiber is not an adequate substitute for C-band content distribution.<sup>5</sup> Current fiber deployments are not nearly extensive enough to replace nationwide C-band coverage and lack the C-band’s reliability and resiliency. Even where fiber is available, it is vastly more expensive than the C-band satellite service. Moreover, building fiber out with the redundancy that is required for video programming distribution is a decades-long process.

Equally troubling is the plan recently put forth by Charter.<sup>6</sup> Like T-Mobile, Charter makes no provision for protection of current users of C-band spectrum. For example, Charter does not explain how, under its plan, the additional satellites that would be necessary to ensure continuity of service for existing customers would be built and launched. Perhaps Charter simply assumes—incorrectly—that additional satellites will not be needed. Indeed, Charter merely suggests, without elaboration, that “at least some earth station users” could be transitioned to fiber to accommodate terrestrial 5G in the C-band.<sup>7</sup> For the reasons stated above, however, fiber is not an acceptable or realistic alternative to the C-band for the programmers and broadcasters that rely on it today.

Because it is the only plan that will protect incumbent C-band customers while freeing-up spectrum for terrestrial 5G, Learfield IMG College endorses the CBA’s Market-Based Approach and urges the Commission to adopt it expeditiously.

Respectfully submitted,

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<sup>5</sup> See, e.g., Comments of Comcast Corporation and NBCUniversal Media, LLC, GN Docket No. 18-122, at 18 (Oct. 29, 2018); Comments of the C-Band Alliance, GN Docket No. 18-122, at 11 (Oct. 29, 2018); Reply Comments of the Content Companies, GN Docket No. 18-122, at 4 (Dec. 11, 2018); Comments of Cumulus Media Inc. and Westwood One, LLC, GN Docket No. 18-122, at 5 (Oct. 29, 2018); Comments of GCI Communication Corp., GN Docket No. 18-122, at 12 (Oct. 29, 2018).

<sup>6</sup> Letter from Elizabeth Andron, Senior Vice President, Regulatory Affairs, Charter Communications, Inc. (Feb. 22, 2019).

<sup>7</sup> *Id.* at 5.